UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE MEXICAN GOVERNMENT BONDS	Master Docket No. 18-cv-02830
ANTITRUST LITIGATION	
THIS DOCUMENT RELATES TO:	
ALL ACTIONS	

PLAINTIFFS' NOTICE OF MOTION

FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENTS WITH BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., BARCLAYS CAPITAL SECURITIES LIMITED, BARCLAYS BANK MÉXICO, S.A., INSTITUCIÓN DE BANCA MÚLTIPLE, GRUPO FINANCIERO BARCLAYS MÉXICO, AND GRUPO FINANCIERO BARCLAYS MÉXICO, S.A. DE C.V. AND WITH JPMORGAN CHASE & CO., J.P. MORGAN BROKER-DEALER HOLDINGS INC., J.P. MORGAN SECURITIES LLC, JPMORGAN CHASE BANK, NATIONAL ASSOCIATION, BANCO J.P. MORGAN, S.A. INSTITUCIÓN DE BANCA MÚLTIPLE, J.P. MORGAN GRUPO FINANCIERO, AND J.P. MORGAN SECURITIES PLC

PLEASE TAKE NOTICE that, upon the accompany memorandum of law, the Declaration of Vincent Briganti dated June 1, 2020 and the exhibits attached thereto including the Settlement Agreements, and the record herein, Plaintiffs Oklahoma Firefighters Pension & Retirement System, Electrical Workers Pension Fund Local 103, I.B.E.W., Manhattan and Bronx Surface Transit Operating Authority Pension Plan, Metropolitan Transportation Authority Defined Benefit Pension Plan Master Trust, Boston Retirement System, Southeastern Pennsylvania Transportation Authority Pension Plan, United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund, and Government Employees' Retirement System of the Virgin Islands ("Plaintiffs"), by and through their undersigned counsel, will respectfully move this court, before the Honorable J. Paul Oetken, United States District Judge, at the United States District Court, Southern District of New York, 40 Foley Square, New York, New York at a date and time to be determined by this Court, for an order granting Plaintiffs' motion for preliminary approval of the settlements with Defendants Barclays PLC, Barclays Bank PLC, Barclays Capital Inc., Barclays Capital Securities Limited, Barclays Bank México, S.A., Institución de Banca Múltiple, Grupo Financiero Barclays México, and Grupo Financiero Barclays México, S.A. de C.V. (collectively, "Barclays") and with Defendants JPMorgan Chase & Co., J.P. Morgan Broker-Dealer Holdings Inc., J.P. Morgan Securities LLC, JPMorgan Chase Bank, National Association, Banco J.P. Morgan, S.A. Institución de Banca Máltiple, J.P. Morgan Grupo Financiero, and J.P. Morgan Securities PLC (collectively, "IPMorgan") and the other relief set forth in the proposed order filed herewith.

Dated: June 1, 2020 White Plains, New York

LOWEY DANNENBERG P.C.

/s/ Vincent Briganti
Vincent Briganti
Christian Levis
Roland R. St. Louis, III
44 South Broadway
White Plains, NY 10601

Tel.: (914) 997-0500 Fax: (914) 997-0035

Email: vbriganti@lowey.com clevis@lowey.com rstlouis@lowey.com

Plaintiffs' Lead Counsel

Joseph J. Tabacco, Jr.

Todd Seaver

Carl N. Hammarskjold

Colleen L. Cleary

BERMAN TABACCO

44 Montgomery Street, Suite 650

San Francisco, CA 94104

Tel.: (415) 433-3200 Fax: (415) 433-6382

Email: jtabacco@bermantabacco.com

tseaver@bermantabacco.com

chammars kjold@bermantabacco.com

ccleary@bermantabacco.com

Patrick T. Egan

BERMAN TABACCO

One Liberty Square

Boston, MA 02109

Tel.: (617) 542-8300

Fax: (617)542-1194

Email: pegan@bermantabacco.com

Scott Martin

HAUSFELD LLP

33 Whitehall Street

14th Floor

New York, NY 10004

Tel.: (646) 357-1100

Fax: (212) 202-4322

Email: smartin@hausfeld.com

Michael D. Hausfeld

Hilary K. Scherrer

HAUSFELD LLP

1700 K Street, NW

Washington, DC 20006

Tel.: (202) 540-7200

Fax: (202) 540-7201

Email: mhausfeld@hausfeld.com

hscherrer@hausfeld.com

Michael P. Lehmann HAUSFELD LLP 600 Montgomery Street

Suite 3200

San Francisco, CA 94111 Tel.: (415) 633-1908 Fax: (415) 358-4980

Email: mlehmann@hausfeld.com

Fred T. Isquith
Thomas H. Burt
Betsy S. Manifold
WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
270 Madison Avenue
New York, NY 10016

Tel.: (212) 545-4600

Email: isquith@whafh.com burt@whafh.com manifold@whafh.com

Christopher M. Burke

SCOTT+SCOTT ATTORNEYS AT LAW LLP

600 W. Broadway, Suite 3300

San Diego, CA 92101 Tel.: (619) 233-4565 Fax: (619) 233-0508

Email: cburke@scott-scott.com

Thomas K. Boardman

SCOTT & SCOTT ATTORNEYS AT LAW LLP

230 Park Avenue, 17th Floor

New York, NY 10169 Tel.: (212) 519-0523 Fax: (212) 223-6334

Email: tboardman@scott-scott.com

John Radice

Daniel Rubenstein

RADICE LAW FIRM, P.C.

34 Sunset Blvd.

Long Beach, NJ 08008 Tel.: (646) 245-8502 Fax: (609) 385-0745

Email: jradice@radicelawfirm.com

drubenstein@radicelawfirm.com

Eric L. Young SHEPHERD FINKELMAN MILLER & SHAH, LLP 35 East State Street Media, PA 19063 Tel.: (610) 891-9880 Fax: (866) 300-7367

Email: eyoung@sfmslaw.com

Lesley E. Weaver
Matthew S. Weiler
Emily C. Aldridge
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
Email: lweaver@bfalaw.com
mweiler@bfalaw.com

Javier Bleichmar BLEICHMAR FONTI & AULD LLP 7 Times Square, 27th Floor New York, NY 10036 Tel.: (212) 789-1340 Fax: (212) 205-3960 Email: jbleichmar@bfalaw.com

ealdridge@bfalaw.com

William J. Ban Michael A. Toomey BARRACK, RODOS & BACINE 11 Times Square 640 8th Avenue, 10th Floor New York, NY 10022 Tel.: (212) 688-0782 Fax: (212) 688-0782

Email: wban@barrack.com mtoomey@barrack.com

Jeffrey A. Barrack Jeffrey B. Gittleman BARRACK, RODOS & BACINE 3300 Two Commerce Square 2001 Market Street, Suite 3300 Philadelphia, PA 19103 Tel.: (215) 963-0600

Fax: (215) 963-0838

Case 1:18-cv-02830-JPO Document 209 Filed 06/01/20 Page 6 of 6

Email: jbarrack@barrack.com jgittleman@barrack.com

Regina M. Calcaterra James A. Aliaga CALCATERRA POLLACK LLP 1140 Avenue of the Americas, 9th Floor New York, NY 10036-5803 Tel: (212) 899-1760 Email: rcalcaterra@calcaterrapollack.com

jaliaga@calcaterrapollack.com

Additional Counsel for Plaintiffs